

WED

AMENDED COMPLAINT

(for filers who are prisoners without lawyers)

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff)

Angela A. Scheit

v.

Case Number:

22-cv-1138

(to be supplied by Clerk of Court)

(Full name of defendant(s))

Sheriff Christopher Schmalong

Dr. Leonard Todd

Latisha Ramus NP

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

151 County Road K Fond du lac WI 54937
(Address of prison or jail)

2. Defendant Sheriff Christopher Schmalong, Dr. Leonard Todd
and Latisha Ramus. (Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

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and (if a person) resides at 717 Wisconsin Ave Racine WI 53403
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Prind Medical contracted for Racine County Jail.
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

From December 16, 2019 to Sept 13, 2022 Litisha Ramus
did not address several of my medical conditions
resulting in conditions worsening and resulting in
transportation to Emergency Room on two separate
occasions. One incident was a mental health episode
that resulted in emergency room care. The other
was a dental abscess that went neglected. Another
medical condition that went untreated and monitored
upon numerous requests to do so was the monitoring
and controlling blood sugars due to diabetes. Additionally
prior to entering jail I had a small abdominal hernia

and was not allowed my abdominal binder, my hernia exponentially grew, now requiring even a bigger/larger surgery. I had small plantar warts that went left untreated for so long that I had to go have them scraped/scalpulated out resulting in multiple treatments then became infected when refused to give me band-aids/antibiotic ointment as the foot doctors instructions said to. Another medical condition that went neglected was I was not given glasses or taken to eye doctor until after 2 yrs of being there. Informing them that I needed glasses. Not to mention my eyes should have been monitored also due to my diabetes. I was also refused for any and all booster covid vaccines. Stating time and time again 'boosters' were not given or available to Racine County Jail. I contracted covid three times while there. Additionally, my requests on tests for my heart went ignored even after my visit to the emergency room. My heart had not been ruled out as a factor. The emergency room

Additional Page for Statement of Claim.

believed it to be a anxiety attack. They still instructed the Jail should follow up with regulating/ monitoring my blood sugars because they tested so high. They also said they need to address my mental health. Upon repeated requests letting Latisha know there was something wrong with my heart that I needed further heart testing she refused repeatedly. months later she eventually allowed someone to come in and do a x-ray (echo) of my heart and go out to do a stress test. By time the x-ray came back I was told something didn't look right and wanted me to go out to the cardiologist. A week or two later I was transported to Taycheedah Correctional Institution. So I was unable to go have the results given to me. Additionally, about August 2022 the Shover continued to over flow into the day space resulting in me slipping and falling with all my body weight landing directly on my right knee. Medical came to see me and told me I'd got ibuprofenardies. That they would have it x-rayed the following day. It swelled and bruised and went neglected with no care or x-ray after day of fall. The second week of September after continuous complaints they finally x-rayed it but again I was transported to Taycheedah Correctional Institution without results. Additionally I had injured my arm in 2020 while incarcerated by baring a wall. I had advised medical later that year that I believe I permanently did damage and how horrible the pain had gotten worse. I requested one and time again for MRI. They eventually had the MRI done yet I told them they didn't take a MRI of the right area. It went ignored along with my pain. I am now going through physical therapy here at TCI so I can have a MRI of the area that should have had the MRI. Since I arrived at TCI on Sept 14 2022 has repeatedly requested

From Racine County Jail medical A copy of results on the following:

Heart X-ray (echo)

Abdominal Hernia ultra sound

X-ray of right knee.

As of April 17th, Racine County Jail (mend medical) has not sent anything as requested.

Lisha Ramm is the responsible party for all the medical conditions worsening and not being treated because she was the only acting NP that had to make any and all decisions.

Dr. Leonard Teold is responsible for all medical conditions worsening and not being treated because he was the overseeing Doctor of Lisha Ramm. Sheriff Christopher Schmalina is responsible for my medical conditions worsening and not being treated because he is responsible for his contracted mend medical, medical staff.

I hand wrote two to three letters to Sheriff Christopher Schmalina via paper requests.

I'm requesting that it be Court ordered that Racine County Jail/mend medical Send the results of my heart X-ray (echo), ultra sound of abdominal hernia, and X-ray of knee. I'm also requesting the discharge/diagnosis papers of both Emergency room visits from Racine County Jail in 2022. Additionally I have been requesting for 6 months from Racine County Jail Records, as well as before I left, A copy of 'all' medical requests AND grievances via the Request manager from 1-1-2021 to 9-13-2022. Could this also be court ordered due to the fact the request manager is the record of all dates and descriptions of all medical requests and complaints. They ignore all my requests I forgot to mention I'm

Still in pain from Hernia, right knee and upper right arm. Resulting in physical therapy and in future (after physical therapy) having MRI done on knee and corrected area of upper arm.

C. JURISDICTION

I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

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I am suing under state law. The state citizenship of the plaintiff is different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

Award of money for wilful neglect,
deliberate Indifference and pain and
suffering.

E. JURY DEMAND

I want a jury to hear my case.

- YES - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 17 day of April 2023.

Respectfully Submitted,

Angela A. Schmit
Signature of Plaintiff

713126
Plaintiff's Prisoner ID Number

751 County Road K
Fond du lac WI 54937
(Mailing Address of Plaintiff)